



We Have Read 10 U.S. Code § 2391: What else can OEA fund?

Association of Defense Communities

Grants 101

June 18, 2018





Introduction

- The Compliance & Integration grants team consists of subject-matter-experts in Federal and Defense grant regulations.



Goal

- **Funding guidance and clarifications for OEA grant applicants and current grant recipients**

Order of Precedence

- 10 U.S. Code § 2391 authorizes OEA to provide financial assistance to States and Local Governments impacted by Defense department decisions

Order of Precedence, cont'd

- Title 2, Subtitle A, Chapter 2, Title 200 of the Catalog of Federal Regulations
 - Contains administrative requirements, cost principles, and audit requirements for Federal awards

Scope of Work and Costs

- **Allocable**
 - **Specific to the award**
 - **Necessary**
 - **Beneficial**



Scope of Work and Costs, cont'd

- **Allowable**
 - Permitted by 10 U.S. Code § 2391 and 2 CFR 200
 - Authorized in the Terms and Conditions
 - DoD Grant and Agreement Regulations
 - National Policy Requirements
 - OEA General Terms and Conditions
 - Program-specific Terms and Conditions

Scope of Work and Costs, cont'd

- Reasonable
 - Prudent person test
 - Fair Market value
 - Agency discretion

Scope of Work and Costs, cont'd

- Always remain on the AARC
 - Allocable
 - Allowable
 - Reasonable
 - Costs



Scope of Work and Costs, cont'd

- Allowed does not mean entitlement
- Detailed justification
- Key Supporting Documentation

Special Areas of Consideration

- **Indirect Costs**
 - **Cognizant Federal Agency**
 - **Self-Certification**
 - **Negotiated Indirect Cost Rate Agreement**

Special Areas of Consideration, cont'd

- Program Income
 - Deduction
 - Addition
 - Matching

Special Areas of Consideration, cont'd

- **Dissemination of technical information**
 - **Incidentals**
 - **Attendance**
 - **Formal**

Special Areas of Consideration, cont'd

- Capacity Building
- Pre-award Costs
- Non-competitive procurement

Special Areas of Consideration, cont'd

- **Types of procurement**
 - Micro-purchase
 - Small purchase
 - Sealed bids
 - Competitive proposals
 - Non-competitive proposals



Proactive Grants Management

- **Grants Compliance Tracker**
 - **Timeline with Monthly Metrics**
 - Award life cycle
 - Reports
 - Payment Activity
 - Deliverables



Grant Compliance Timeline with Monthly Metrics

		Grant Title																					
		FAIN: HQ00050000000										OEA Award Number: CL0000-00-00											
		FY 18 Begins Grant Award Begins										FY 19 Begins											
		CY 2017										CY 2018											
Report Driver		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
Performance Report 1										Due 10/31/18													
Performance Report 2													Due 1/31/18										
Performance Report 3																	Due 4/30/18						
Performance Report 4																						Due 9/30/18	
Final Performance Report																						Due 9/30/18	
Final Federal Financial Report																						Due 9/30/18	
Payment Request 1											11/25/2017 paid												
Payment Request 2													1/31/18 paid										
Payment Request 3															3/31/18 paid								
Payment Request 4																	5/5/18 paid						
Payment Request 5																			7/28/18 paid				
Payment Request 6																						9/15/18 paid	
		90 day window to submit final payment																					

Compliance & Integration Team Contacts

- Nia Hope, Deputy Director
- Michael Wilson, Deputy Program Director
- Karen Bass-McFadden, Grants Management Specialist

karen.e.bass-mcfadden.civ@mail.mil or
(703) 697-2161

Questions?



Resources

- www.oea.gov
- www.grants.gov
- www.sam.gov



References

1. 10 U.S.C. 2391. Military Base Reuse Studies and Community Planning Assistance.
2. 2 CFR 200. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
3. Defense Acquisition University. Grants and Agreements Management 18-606 (GRT201)
4. U.S. Government Accountability Office, March 2005. Can Your Agency Use Appropriated Funds for Meals and Light Refreshments?